

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FRANK QUAGLIA,

Plaintiff,

-against-

BRAVO NETWORKS, NATIONAL  
BROADCASTING COMPANY, INC.,  
doing business as NBC; RAINBOW  
PROGRAMMING HOLDINGS, INC. and  
DOES 1-10,

Defendants.

Civil Action No. 04-10460 RWZ

**DEFENDANT RAINBOW MEDIA  
HOLDINGS LLC'S MOTION FOR  
LEAVE TO FILE FACSIMILE COPY  
OF DECLARATION OF DEBBIE  
DeMONTREUX**

Defendant, Rainbow Media Holdings, LLC, sued herein as Rainbow Programming Holdings, Inc. ("Rainbow"), hereby moves for leave to file a facsimile copy of the Declaration of Debbie DeMontreux submitted as Exhibit C in support of Rainbow's Response to Plaintiff's Addendum to His May 31, 2005 Motion to Compel. As grounds for its motion, Rainbow states as follows:

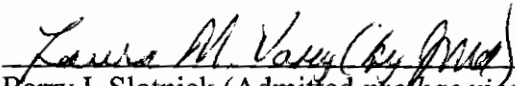
1. Rainbow is today filing its Response to Plaintiff Frank Quaglia's Addendum to His Motion to Compel.
2. Rainbow is filing the Declaration of Debbie DeMontreux in support of its response to plaintiff's Motion to Compel in order to verify certain budget information provided to the plaintiff.
3. Because Ms. DeMontreux is in New York, it was not possible to receive the original of her Declaration in Boston before today's filing deadline. The original is being delivered to Rainbow's local counsel in Boston, however, and will be promptly filed with the

Court. In the meantime, Rainbow seeks leave to file a facsimile copy of the executed original today so that its filings will be complete and to file the original of the Declaration immediately upon its receipt by local counsel.

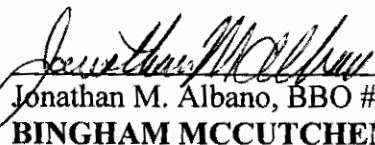
WHEREFORE, Rainbow Media Holdings LLC respectfully requests that its motion for leave to file a facsimile copy of the Declaration of Debbie DeMontreux, submitted in support of Rainbow's Response to Plaintiff's Addendum to His Motion to Compel, be allowed by the Court.

**RAINBOW MEDIA HOLDINGS LLC (sued  
herein as RAINBOW PROGRAMMING  
HOLDINGS, INC.)**

By its attorneys,

  
Barry I. Slotnick (Admitted *pro hac vice*)  
Laura M. Vasey (Admitted *pro hac vice*)

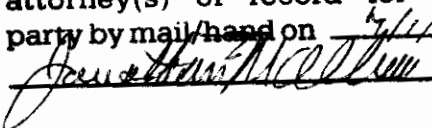
**LOEB & LOEB LLP**  
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(212) 407-4000

  
Jonathan M. Albano, BBO #013850  
**BINGHAM MCCUTCHEN**  
150 Federal Street  
Boston, Massachusetts 02110  
(617) 951-8000

Dated: July 1, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of  
the above document was served upon the  
attorney(s) of record for each other  
party by mail/hand on 7/1/05,

  
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